

**HEARING DATE AND TIME: AUGUST 30, 2021 AT 10:00 A.M.**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

**286 RIDER AVE ACQUISITION LLC,**

Debtor.

Chapter 11

Case No. 21-11298 (LGB)

**RELATED DOC. NO. 17**

**NOTICE OF FILING JOINDERS TO 286 RIDER AVE DEVELOPMENT LLC'S  
MOTION TO (I) DISMISS BANKRUPTCY CASE PURSUANT TO 11 U.S.C. §§ 105, 305  
AND 1112 AND (II) FOR TURNOVER OF CERTAIN MEMBERSHIP INTERESTS  
UNDER 11 U.S.C. § 543**

286 Rider Ave Development LLC ("Development"), by and through undersigned counsel, hereby files the *Joinders* by (i) Titan Engineers PC, (ii) Fischer and Makooi Architects PLLC and (iii) 286 Rider Associates LLC attached hereto as **Exhibits A, B and C** respectively, to the *Motion to (i) Dismiss Bankruptcy Case Pursuant to 11 U.S.C. §§ 105, 305 and 1112 and (ii) for Turnover of Certain Membership Interests Under 11 U.S.C. § 543 [ECF No. 17]*.

Dated: New York, New York  
August 30, 2021

AKERMAN LLP

By: /s/Mark S. Lichtenstein  
Mark S. Lichtenstein  
Joshua D. Bernstein  
1251 Avenue of the Americas, 37<sup>th</sup> Floor  
New York, New York 10020  
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*Counsel for 286 Rider Ave Development LLC*

## **EXHIBIT A**

### **JOINDER BY TITAN ENGINEERS PC**



Via E-Mail  
08.29.2021

**RE: Professional Engineering Services**  
Building Design New Ground-Up  
**286 Rider Ave**  
**Bronx, NY 10451**  
TEPC Project No.: TJ19122

Dear Judge Lisa Beckerman:

As a creditor of 286 Rider Acquisition LLC, in the amount of about \$50,000, I hereby join in the objection of Michael Lichtenstein, who is the Developer of 286 Rider, and a longtime client of mine. Through his business Mr. Lichtenstein has employed hundreds of workers on an annual basis, and has worked hard to offer opportunity to young men and women in the construction and development industry. Michael is the son of two immigrants and through his hard work and perseverance has transformed many neighborhoods in NYC, and stands out as an example of a great developer who cares about the communities in which he builds.

I support the motion to dismiss the bankruptcy. I believe that the best outcome for New York City and all parties involved is to allow Mr. Lichtenstein to provide the time and leeway to arrange for the full construction financing to complete the project.

Should you have any questions or comments concerning this or any other matter, please, do not hesitate to contact our office.

Sincerely,  
**TITAN ENGINEERS PC**

A handwritten signature in black ink, appearing to read "Yubun (Jack) Auyeung".

Yubun (Jack) Auyeung, PhD, PE  
Principal

YA\I\Projects\2019\TJ19122 - 286 Rider Ave, Bronx, NY 10451\NOWORKPERMITTED\Docs\Letters\CLTR-286 Rider-TJ19122-0-210829.doc  
Enclosure(s)

**NEW JERSEY OFFICE:**  
▲ 1331 STUYVESANT AVE UNION NJ 07083  
■ 908 624 0044

■ [WWW.TITANENGINEERS.COM](http://WWW.TITANENGINEERS.COM) ■ 877 364 8484

**NEW YORK OFFICE:**  
▲ 47 SERENE PL HAUPPAUGE NY 11788  
■ 631 885 8059

## **EXHIBIT B**

### **JOINDER BY FISCHER AND MAKOOI ARCHITECTS PLLC**



8/29/2021

To Whom It May Concern,

I am a creditor of 286 Rider Acquisition LLC of approximately \$80,000. I am reaching out in support of the objection of Michael Lichtenstein filed in the bankruptcy case 21-11298-LGB.

I support the motion to dismiss the bankruptcy. The bankruptcy case in the matter of 286 Rider Acquisition LLC that was filed by the lender should be dismissed. I believe that my interests will be better protected if Mr. Lichtenstein is allowed to refinance the current loan and arrange a construction loan. This will allow recovery to all creditors, rather than letting the current lender undermine this project to their advantage only to the detriment of all other creditors.

Sincerely,

A handwritten signature in black ink, appearing to read "Fariba Makooi".

Fariba Makooi, RA, AIA  
Principal

## **EXHIBIT C**

### **JOINDER BY 286 RIDER ASSOCIATES LLC**

**286 Rider Associates LLC  
C/O Robert Newblatt  
213 Via Emilia  
Palm Beach Gardens, FL 33418**

**August 30, 2021**

Re: Case No. 21-11298-LGB

ATTN: Judge Beckerman,

286 Rider Associates LLC is a creditor of 286 Rider Ave Acquisition LLC (“Debtor”) in an amount of more than \$1,000,000. We hereby join in the motion to dismiss of Debtor, as raised by 286 Rider Ave Development LLC.

We support the motion to dismiss the Bankruptcy. We believe that the Debtor’s bankruptcy case is not in our best interests. We request that Debtor be allowed to refinance and move forward outside of any Bankruptcy.

Thank you –

/s

Robert Newblatt